

# HAFETZ & NECHELES LLP

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October 11, 2018

**VIA ECF**

Honorable Nicholas G. Garaufis  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Raniere, et al.*, 18-cr-204 (NGG)

Dear Judge Garaufis:

I write to request a temporary modification of Ms. Bronfman's bail conditions to allow her to accompany me on a trip to the Albany/Clifton Park area in the Northern District of New York on October 16-17, 2018, for purposes of conducting defense investigation in preparation for trial in the above-captioned case. The government has no objection to this request, and Pretrial Services takes no position. If Ms. Bronfman's request is approved, I will provide Pretrial Services with the specifics of our travel plans on those dates.

Respectfully submitted,

/s/

Kathleen E. Cassidy

cc: AUSAs Moira Kim Penza, Tanya Hajjar (via ECF)  
Pretrial Services Officer Anna Lee (via email)